

## REMARKS

### Amendment to the Claims

Applicants have amended Claim 17 to more clearly define Applicants' invention by clarifying the nature of the first layer formation process. Support for the amendment can be found in Fig. 1, page 14 line 31 – page 15 line 3, as well as elsewhere in the Application.

### Claim rejections

A. The Examiner rejected Claims 17 and 28 under 35 U.S.C. §102(b) as being anticipated by Fraas et al. (US 5091018). Applicants respectfully traverse this rejection.

Applicants have amended Claim 17 to specify that the first layer of the substrate is formed "at a front surface and at least one edge surface." Claim 28 depends from amended Claim 17 and, therefore, includes such element.

Fraas et al. do not disclose a first layer as claimed in amended Claim 17 and 28. Therefore, Applicants respectfully request that the Examiner withdraw this rejection.

With respect to Claim 28, the Examiner states that the element in Fraas et al. corresponding with Applicants' surface coating is element 66 (Office Action page 2, page 6). The Examiner uses element 66 of Fraas et al. as the surface coating when addressing Claim 17 but then switches to element 62 of Fraas et al. for the surface coating of Claim 28. This use of 2 different elements is contrary to the plain wording of the claims. Applicants respectfully request that Examiner withdraw this rejection.

B. The Examiner rejected Claim 21 under U.S.C. §103(a) as being unpatentable over Fraas et al. (US 5091018). Applicants respectfully traverse this rejection.

Claim 21 depends from amended Claim 17 and so includes all of the elements of amended Claim 17.

Fraas et al. neither teach nor suggest Applicants' invention as set forth in Claim 21 because, for example, there is no teaching or suggestion of forming a first layer of the substrate at a front surface and at least one edge surface. In fact, Fraas et al. teach away from Applicants' invention because Fraas et al. teach that an insulating layer (62) is applied then treated to form an opening (63) and the substrate exposed at the opening is doped.

Applicants', therefore, respectfully request that the Examiner withdraw this rejection.

C. The Examiner rejected Claims 18-20 under 35 U.S.C. §103(a) as being unpatentable over Fraas et al. (US 5091018) in view of Rittner (US 4135950). Applicants respectfully traverse this rejection.

Claims 18-20 depend from amended Claim 17 and, therefore, include the step of forming a first layer of the substrate at a front surface and at least one edge surface. Neither Fraas et al. nor Rittner, alone or in combination, teach or suggest such a step. Therefore, Claims 18-20 are patentable over Fraas et al. and Rittner.

With respect to Claim 19, in addition to the reasons above, Rittner does not teach or suggest removing texture from the back surface of the substrate. The sections of Rittner cited by the Examiner in the July 14, 2006, Office Action do not disclose any process step of removing texture from the back surface of the substrate. In particular, there is no disclosure of the back surface ever having been textured in the first place. It would be impossible to remove texture which was never present.

In fact, Rittner specifies that the back surface not be textured because the back surface of the substrate is masked prior to etching to protect it from etching (col. 2, lines 18-21). The precise etching parameters are critical to Rittner's disclosure (col. 2, lines 56-59) and, therefore, one of skill in the art is led away from modifying the etching process of Rittner to achieve Applicants' etched back surface and subsequent removal of the etching from the back surface. There is no disclosure that would teach or suggest to a person of skill in the art that the back surface of a substrate textured and then the texture is removed as claimed by Applicants in Claim 19.

D. The Examiner rejected Claim 31 under 35 U.S.C. §103(a) as being unpatentable over Fraas et al. (US 5091018) in view of Minahan et al. (US 4610077). Applicants respectfully traverse this rejection.

Claim 31 depends from amended Claim 17 and, therefore, include the step of forming a first layer of the substrate at a front surface and at least one edge surface. Neither Fraas et al. nor Minahan et al., alone or in combination, teach or suggest such a step. Therefore, Claims 18-20 are patentable over Fraas et al. and Minahan et al.

For the reasons above, Applicants believe that the pending Claims 17-21, 28 and 31 are in condition for allowance. Applicants appreciate the Examiner's reconsideration of this matter and respectfully request that the Examiner pass the instant application for allowance.

If the Examiner has any question regarding this paper, the Examiner is encouraged to contact Applicants' attorney at the Examiner's convenience.

Correspondence Address:  
BP America Inc.  
Docket Clerk, Law Department, M.C. 5 East  
4101 Winfield Road  
Warrenville, Illinois 60555

Respectfully submitted,



Himanshu A. Vyās  
Attorney for the Applicant(s)  
Registration Number 52,331  
(630) 821-2443